

STATE OF SOUTH CAROLINA

(Caption of Case)  
In Re:

Application of South Carolina Electric & Gas  
Company for the Establishment and Approval of  
DSM Programs and Rate Rider

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA  
COVER SHEET

DOCKET  
NUMBER: 2009 - 261 - E

(Please type or print)

Submitted by: Frank Knapp, Jr.  
Address: 1717 Gervais Street  
Columbia, SC 29201

SC Bar Number:  
Telephone: 803-765-2210  
Fax: 803-799-0678  
Other:  
Email: fknapp@knappagency.com

NOTE: The cover sheet and information contained herein neither replaces nor supplements the filing and service of pleadings or other papers as required by law. This form is required for use by the Public Service Commission of South Carolina for the purpose of docketing and must be filled out completely.

DOCKETING INFORMATION (Check all that apply)

☐ Emergency Relief demanded in petition ☐ Request for item to be placed on Commission's Agenda expeditiously  
☐ Other:

INDUSTRY (Check one)	NATURE OF ACTION (Check all that apply)		
<input checked="" type="checkbox"/> Electric	<input type="checkbox"/> Affidavit	<input type="checkbox"/> Letter	<input type="checkbox"/> Request
<input type="checkbox"/> Electric/Gas	<input type="checkbox"/> Agreement	<input type="checkbox"/> Memorandum	<input type="checkbox"/> Request for Certificatio
<input type="checkbox"/> Electric/Telecommunications	<input type="checkbox"/> Answer	<input type="checkbox"/> Motion	<input type="checkbox"/> Request for Investigation
<input type="checkbox"/> Electric/Water	<input type="checkbox"/> Appellate Review	<input type="checkbox"/> Objection	<input type="checkbox"/> Resale Agreement
<input type="checkbox"/> Electric/Water/Telecom.	<input type="checkbox"/> Application	<input type="checkbox"/> Petition	<input type="checkbox"/> Resale Amendment
<input type="checkbox"/> Electric/Water/Sewer	<input type="checkbox"/> Brief	<input type="checkbox"/> Petition for Reconsideration	<input type="checkbox"/> Reservation Letter
<input type="checkbox"/> Gas	<input type="checkbox"/> Certificate	<input type="checkbox"/> Petition for Rulemaking	<input type="checkbox"/> Response
<input type="checkbox"/> Railroad	<input type="checkbox"/> Comments	<input type="checkbox"/> Petition for Rule to Show Cause	<input type="checkbox"/> Response to Discovery
<input type="checkbox"/> Sewer	<input type="checkbox"/> Complaint	<input checked="" type="checkbox"/> Petition to Intervene	<input type="checkbox"/> Return to Petition
<input type="checkbox"/> Telecommunications	<input type="checkbox"/> Consent Order	<input type="checkbox"/> Petition to Intervene Out of Time	<input type="checkbox"/> Stipulation
<input type="checkbox"/> Transportation	<input type="checkbox"/> Discovery	<input type="checkbox"/> Prefiled Testimony	<input type="checkbox"/> Subpoena
<input type="checkbox"/> Water	<input type="checkbox"/> Exhibit	<input type="checkbox"/> Promotion	<input type="checkbox"/> Tariff
<input type="checkbox"/> Water/Sewer	<input type="checkbox"/> Expedited Consideration	<input type="checkbox"/> Proposed Order	<input type="checkbox"/> Other:
<input type="checkbox"/> Administrative Matter	<input type="checkbox"/> Interconnection Agreement	<input type="checkbox"/> Protest	
<input type="checkbox"/> Other:	<input type="checkbox"/> Interconnection Amendment	<input type="checkbox"/> Publisher's Affidavit	
	<input type="checkbox"/> Late-Filed Exhibit	<input type="checkbox"/> Report	

BEFORE THE  
PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In re:	)	Docket No.: 2009-261-E
	)	
	)	
Application of South Carolina Electric	)	
& Gas Company for the Establishment	)	<b>PETITION TO INTERVENE OF</b>
and Approval of DSM Programs and	)	<b>FRANK KNAPP, JR.</b>
Rate Rider	)	
	)	

Frank Knapp. Jr. hereby petitions the Public Service Commission of South Carolina (“Commission”), pursuant to 26 S.C. Reg. 103-836 and other applicable rules and regulations of the Commission for the permission to intervene in the above-captioned docket. In support of this Petition, Mr. Knapp would show the following:

1. I reside at 118 E. Selwood Lane, Columbia, South Carolina 29212, and I own an office building located at 1717 Gervais Street in Columbia, South Carolina. Both are served by SCE&G.
2. I represent myself in this proceeding.
3. In this proceeding the Commission will determine DSM programs for both residential and commercial establishments and determine a rate rider for SCE&G customers.
4. I am a residential and a commercial customer of SCE&G. At this stage of the proceeding, I have not fully determined what positions I will take.
5. As a residential and commercial customer my intervention will aid the Commission by assisting in the development of a full and fair record to address

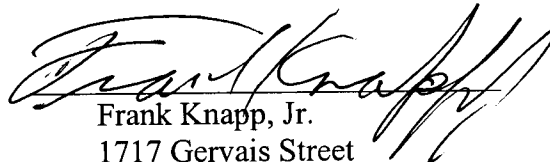
the issues rasided in this proceeding. I have a direct and material interest in the issues to be addressed and resolved by the Commission in this docket and my interests are not adequately represented by the current parties to this proceeding.

6. I am informed and believe that granting my request to be made a party of record in the above-captioned proceeding is in the public interest, is consistent with the policies of the Commission in encouraging maximum public participation in the issues before it, and should be allowed so that a full and complete record addressing the views and concerns of myself can be developed.

WHEREFORE, for the reasons set forth above:

- A. That this petition to intervene be granted by the Commission and that I be made a formal party of record to the proceeding;
- B. That I be allowed to participate fully in this proceeding and to take such positions as I deem advisable; and
- C. That such other and further relief be granted as is just and proper.

Dated this 20<sup>th</sup> day of JULY, 2009.



Frank Knapp, Jr.  
1717 Gervais Street  
Columbia, SC 29201  
(803) 765-2210  
[franknapp@knappagency.com](mailto:franknapp@knappagency.com)

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PUBLIC SERVICE COMMISSION  
OF SOUTH CAROLINA

In re: )  
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Application of South Carolina Electric )  
& Gas Company for the Establishment )  
and Approval of DSM Programs and )  
Rate Rider )  
)

Docket No.: 2009-261-E

**CERTIFICATE OF SERVICE**

I hereby certify that on this 20<sup>th</sup> day of July, 2009, I served the Petition to Intervene of Frank Knapp, Jr. by regular mail, with sufficient postage affixed thereto and return address clearly marked, to the following addresses;

**Belton T. Ziegler, Esquire**

**Lee E. Dixon, Esquire**

Pope Ziegler, LLC

Post Office Box 11509

Columbia, SC 29211

**K. Chad Burgess, Esquire**

**Catherine D. Taylor, Esquire**

South Carolina Electric and Gas Company

1426 Main Street MC 130

Columbia, SC 29201

**Shannon Bowyer Hudson, Esquire**

Office of Regulatory Staff

1401 Main Street, Suite 900

Columbia, SC 29201

**Wade Mullins, III, Esquire**

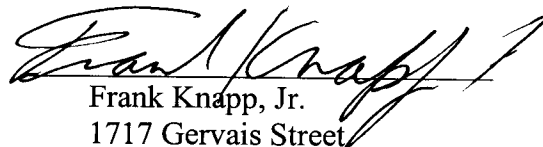
**Joe R. Floyd, Esquire**

Bruner, Powell, Robbins, Wall & Mullins, LLC

Post Office Box 61110

Columbia, SC 29260

**Damon E. Xenopoulos, Esquire**  
Brickfield, Burchette, Ritts & Stone, P.C.  
1025 Thomas Jefferson Street, N.W.  
Eighth Floor – West Tower  
Washington, D.C. 20007

A handwritten signature in black ink, appearing to read "Frank Knapp, Jr.", with a stylized flourish at the end.

Frank Knapp, Jr.  
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